



**DEPARTMENTS OF THE ARMY AND THE AIR FORCE  
NATIONAL GUARD BUREAU  
1411 JEFFERSON DAVIS HIGHWAY  
ARLINGTON, VA 22202-3231**

**NGB-AVS**

**1 August 2002**

**MEMORANDUM FOR THE ADJUTANTS GENERAL OF ALL STATES, PUERTO RICO, THE US VIRGIN ISLANDS, GUAM AND THE COMMANDING GENERAL OF THE DISTRICT OF COLUMBIA**

**SUBJECT: (All States Log Number P02-0033) Army National Guard (ARNG) Indoor Firing Range (IFR) Action Plan and Implementation Guidance**

**1. References:**

- a. 29 Code of Federal Regulations (CFR), Part 1910-Occupational Safety and Health, Subpart Z-Toxic and Hazardous Substances, Section 1025-Lead.
- b. DODIG Audit Report #98-170, 30 June 1998, "ARNG and US Army Reserve Command Small Arms Indoor Firing Ranges".
- c. DODIG Audit Report #99-250, 13 September 1999, "Construction and Rehabilitation of Reserve Components Indoor Small-Arms Ranges".
- d. AR 385-10, The Army Safety Program, 29 February 2000.
- e. AR 385-63, Policy and Procedures for Firing Ammunition for Training, Target Practice and Combat, 15 November 1983.
- f. NGR 200-3, State and Federal Environmental Responsibilities, 1 August 1990.
- g. NGB-AVS (All-States Memorandum Log Number. P01-0075), 5 December 2001, Army National Guard (ARNG) - Policy and Responsibilities for Inspection, Evaluation, and Operation of ARNG Indoor Firing Ranges (IFR) and Guidelines for IFR Rehabilitation, Conversion and Cleaning.
- h. US Army Center for Health Promotion and Preventive Medicine Technical Guide No. 206, Indoor Firing Ranges.
- i. Executive Summary No. EPA 747-R-97-002, March 1997, subject: Laboratory Study of Lead-Cleaning Efficacy.

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j. The Army National Guard Safety and Occupational Health Action Plan "Indoor Firing Ranges" (enclosure 1).

2. Purpose. This guidance is intended to aid the 54 States and Territories with implementation of the ARNG IFR Action Plan. The plan, provided in enclosure 1, is a critical element of the corrective actions proposed to the DODIG in response to their findings. Execution will ensure compliance with references 1.b. and 1.c

3. Requirement. Indoor Firing Ranges are required to meet the provisions of AR 385-63 and 29 CFR 1910.1025. These requirements are intended to ensure safe usage of small-arms ranges, and to prevent exposure of personnel to harmful amounts of Lead (Pb). References 1.b. and 1.c. require that specific actions be taken to reduce the number of unsafe ARNG IFRs. Further, they recommend specific design and housekeeping standards for indoor ranges as prescribed by the National Institute of Occupational Safety and Health. The following corrective actions apply:

a. Identification and inventory of all active and inactive ARNG Indoor Firing Ranges to include ranges in Armories, and Readiness Centers. Inventoried ranges will be entered into the PRIDE (Planning Resources for Infrastructure Development and Evaluation) system under Category Code No. 17121.

b. Evaluation of each IFR to characterize its ability to meet environmental, and safety and health criteria (Safe, Unsafe, or Limited Use), IAW reference 1.g. This includes assessment by Industrial Hygiene sampling of IFRs to determine the level of lead contamination, if any.

c. Risk Assessment/Analysis (RA) of each IFR. The RAs will include provisions to determine the potential for release of hazardous materials into the environment, and must provide for development of adequate preventive measures and safety assessment of bullet traps, backstops, and baffles as applicable.

d. Determining the disposition of each IFR to include plans for future use by Civilian Law Enforcement agencies, or other public use of the facility(s).

e. Completion of necessary IFR corrective actions based on the State's RA, and plans for future use of each range.

4. Process.

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a. The FR Safety Evaluation-Each State and Territory is responsible for conducting IFR safety evaluations IAW reference 1.g. Additionally, an IFR inventory that includes the status and disposition of their ranges must be submitted to National Guard Bureau Aviation and Safety Division, NLT the deadlines established by paragraph 4.b. below.

b. Scheduling/Milestones. The projected schedule for completion of all required corrective actions for ARNG IFRs is 28 February 2010. The dates for completion of critical milestones are established as follows:

(1) 28 February 2003-IFR Inventory and Evaluation by each State.

(2) 28 February 2003-IFR disposition and/or plans for future use as determined by the State.

(3) 28 February 2005-Abatement plans, Scopes of Work, and Contracts developed for IFR Clean up, Conversion, Rehabilitation, and Closure as required.

(4) 28 February 2008-Execution and evaluation of corrective actions.

(5) 28 February 2010-Final reporting to the Department of Defense Inspector General of corrective actions taken to reduce the number of unsafe ARNG IFRs.

c. Reporting. The preferred format for reporting of the IFR safety evaluation, inventory, and range disposition, as required by paragraph 4.a. above are provided at enclosure 2. The following are minimum reporting requirements:

(1) The use of NGB Form 100-14-1, ARNG Risk Management Worksheet, to document and report the RA process, is strongly recommended (See Enclosure 3).

(2) Information related to IFR safety evaluation, status, condition, and classification should also be loaded into PRIDE in coordination with the State CFMO.

(3) The State Safety Office should provide the safety data to the CFMO for input into the PRIDE system using the applicable data elements and responses described in enclosure 4, or input the required data if access to the system has been granted.

**NOTE:** The appendix to FM 100-14 contains instructions for use of the Risk Management Worksheet, and should be used as a guide in developing local Risk Management procedures.

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(4) Additional information such as whether the range is used for Weapons Qualification Training is useful in determining resource requirements for maintenance, upkeep and cleaning, and should also be annotated if known (see enclosure 4).

5. Fiscal Responsibilities. These responsibilities have not been clearly defined in the past. However, protocol has been established in recent years as follows:

a. Funding for operation and maintenance of State owned facilities are the responsibility of each State. Reference 1.c., page 2, states "Military Construction Cooperative Agreements require each State Area Command (STARC) to maintain the armory facilities, including indoor ranges, ..'at its own expense' during the term of the agreement, which can extend 5 to 25 years. Generally, STARCs must fully fund the cost of lead cleanup for routine indoor range maintenance and operations, which have grown significantly since 1980 because of increased health, safety, and environmental requirements."

b. The STARC can also be reimbursed for the costs of disposing of hazardous wastes, such as lead and lead dust generated from live firing. However, this provision applies only to State owned facilities used for Federal missions.

c. State environmental funding is used only for the actual disposal of hazardous waste generated during range cleaning or decontamination operations, as prescribed by reference 1.c. and 1.g.

d. Funding for Federally owned facilities are the responsibility of the Federal Government.

6. This memorandum expires 12 July 2003, unless otherwise rescinded or superceded.

7. Point of contact is Colonel George J. Gluski, Chief, Aviation and Safety Division, at DSN 327-7700 or 703-607-7700. Technical questions pertaining to implementation of

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this plan can be addressed to Mr. Alan G. Lott, Safety and Occupational Health Specialist, at DSN 327-7779 or 703-607-7779.

FOR THE CHIEF, NATIONAL GUARD BUREAU:

4 Encls

1. as
2. IFR Data Submission
3. as
4. PRIDE Safety Data

CF:

NGB-IG

NGB-PL

NGB-ARC

NGB-ARE

NGB-ARI

NGB-ARO

NGB-ARS

NGB-ART

NGB-ARZ-PC

Each State IG

Each State POTO

Each State USPFO

Each NGB Regional Industrial Hygienist

Each State Safety & Occupational Health Office

Each State Occupational Health Nurse

Each State Training Site Commander

Each State CFMO



ROGER C. SCHULTZ

Lieutenant General, GS

Director, Army National Guard

**ARMY NATIONAL GUARD  
SAFETY AND OCCUPATIONAL HEALTH  
ACTION PLAN  
"INDOOR FIRING RANGES"**

**PURPOSE**

This plan identifies corrective actions designed to control and reduce the number of unsafe ARNG Indoor Firing Ranges (IFRs). It sets the milestones necessary to ensure that critical program elements are established and implemented prior to range operation. The regulatory guidance, and procedural methodology described in this plan are consistent with current environmental safety & health practices and standards. Implementation of this plan will safeguard personnel against exposure to Lead (Pb) in harmful amounts, and prevent release of Lead into the environment. Additionally, it will allow ARNG components to safely reactivate IFRs previously determined to be unsafe for operation.

**CORRECTIVE ACTIONS/INITIATIVES**

The following corrective actions/initiatives are required as a result of the Department of Defense Inspector Generals (DODIG) report No. 98-170 "Army National Guard and U.S. Army Reserve Command Small Arms Indoor Firing Ranges":

1. The ARNG has developed regulatory guidance for operation, maintenance, inspection/evaluation, rehabilitation, decontamination, conversion, and closure of IFRs. This guidance was fielded in *September 2000*.
2. Each state and territory will re-evaluate and report the status of their IFRs to the NGB. The evaluation reporting process will include an IFR inventory and classification of each range (Safe, Unsafe or Limited Use), a status report that describes the condition of each range (Closed, Converted, Rehabilitated, Active or Inactive), and the final determination as to the disposition of each range. Completion of the IFR evaluation process is expected by *28 February 2003*.
3. NGB will review scope of work (SOW) documents, abatement plans, action plans, and/or contracts for IFR rehabilitation, decontamination, conversion, or closure submitted by the states and territories. Review of these documents will be completed as they are submitted, in support of item 2 and 4 of this action plan.
4. All ARNG Indoor Firing Ranges will fully comply with governing health and safety standards, and applicable DoD regulatory guidance. The Individual State and/or Territory Hazard Abatement Programs will be used to eliminate identified hazards in conjunction with implementation of this guidance. Significant reduction and effective control in the number of unsafe indoor firing ranges will take approximately 10 years. Completion is expected by *28 February 2010*.

**SUMMARY**

Execution of this plan requires close coordination between the NGB and the fifty-four States and Territories. Budgetary resources must be identified/provided to fulfill the requirements of the plan. Currently IFR rehabilitation, decontamination, conversion, and closure represent unidentified and unfunded fiscal requirements. This could become an obstacle to executing the provision of the plan. To resolve this pitfall, future budgetary forecast should reflect the need for dedicated funding.

# IFR DATA SUBMISSION

STATE \_\_\_\_\_

ITEM No.	RANGE NAME	LOCATION	STATUS	DATE CLSD/CONV	CONTAMINATED Y/N	PROJECTED USE
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(The propo. s NGB-AVN-S)

**(Rank/Name/Title)**



## ARNG RISK MANAGEMENT WORKSHEET (Continuation)

[illegible]

# PRIDE SAFETY DATA

<i>Data Field</i>	<i>Data Element</i>	<i>Response</i>	<i>Notes</i>
38. SAFETY INFORMATION	3801. Condition	CL: Closed	
		CN: Converted	
		RE: Rehabilitated	
	3805. Date CLSD/CONV		
	3802. Status	A: Active	
		I: Inactive	
	3803. Classification	S: Safe	
		U: Unsafe	
		L: Limited Use	
	3804. Contaminated	Yes/No	
39. TRNG DIV INFORMATION	3901. Qualification Rqmt	Yes/No	